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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLES RANDOLPH COMFORT,

Defendant.

Case No. 3:20-cr-00443-JO

**JOINT MOTION FOR
MODIFICATION OF
RELEASE OF CONDITIONS**

Charles Comfort, having conferred through counsel with the Pre-Trial Services Office and the attorney for the government, moves this Court for modification of his release conditions. Applying 18 U.S.C. 3142, this Court originally set release conditions on September 25, 2020. It is now the agreed recommendation of the parties that less restrictive conditions will ensure his appearance in keeping with the safety of the public.

Specifically, the parties and Pre-Trial Services agree that Mr. Comfort's special conditions of supervision be changed to remove reporting to the Pre-Trial Services Office and the other special conditions. Instead, the parties recommend and agree that the only recommended special condition now necessary is for Mr. Comfort to obey all laws. The parties further agree that the

standard statutory conditions of supervision (provided at Docket 13, Items 1-4), may continue unchanged. The United States Pre-Trial Services Office has been consulted on this course and does not object.

Over the 6 months of Mr. Comfort's supervision since September, 2020, he has continuously lived in Santa Cruz, California with this family and remained in compliance with this Court's orders. As documented in materials exchanged by the parties, Mr. Comfort has accrued dozens of community service hours at hunger relief programs in his community. Mr. Comfort has also been taking care of his physical health. He is under the care of an orthopedic surgeon for a shoulder injury and is anticipating a surgical operation as soon as April, 2021. Mr. Comfort has no plans to return to Oregon unless as ordered by this Court.

The parties are negotiating a joint conditional disposition and will address scheduling with this Court through Judge Jones's chambers by April 1, 2021.

In consideration of the agreed assessment of Pre-Trial Services and the government about the least restrictive conditions necessary to comply with 18 U.S.C. 3142, Mr. Comfort respectfully requests a modification of his conditions. Pre-Trial Services will prepare a new modified Conditions of Release order for this Court's approval.

RESPECTFULLY submitted this 19th day of March, 2021.

/s/ Alison M. Clark
Alison M. Clark
Assistant Federal Public Defender